

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE

KIMBERLY WEST, Individually and as
Personal Representative for and of the Estate
of GREGORY ANTONIO WEST, deceased,

Plaintiff,

vs.

CSX TRANSPORTATION, INC.

Defendant.

§
§
§
§
§
§
§
§
§
§
§

No.: 3:21-CV-00255

Jury Trial Demanded

USDC Judge Travis R. McDonough

Magistrate Judge H. Bruce Guyton

AGREED MOTION

Come the parties and respectfully move the Court for the entry of the attached Order to Produce Hospital, Medical and Employment Records.

The Plaintiff's decedent's medical condition is at issue in this case and the production of medical records and employment related records are potentially relevant and material and represent documents calculated to lead to the discovery of admissible evidence.

Exhibit "A" is a proposed Order to Produce Hospital, Medical and Employment Records that the Defendant respectfully asks the Court to approve.

BAKER, O'KANE, ATKINS & THOMPSON, PLLP

S/ John W. Baker, Jr., Esq., BPR #001261

Emily L. Herman-Thompson, Esq., BPR #0021518

Attorneys for Defendant

2607 Kingston Pike, Suite 200

P.O. Box 1708

Knoxville, Tennessee 37901-1708

(865) 637-5600-Office

(865) 637-5608-Fax

E-Mail: [**jbaker@boatlf.com**](mailto:jbaker@boatlf.com)

E-Mail: [**ethompson@boatlf.com**](mailto:ethompson@boatlf.com)

CERTIFICATE OF SERVICE

I hereby certify that on *November 3, 2021*, a copy of the foregoing *Agreed Motion*, was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

S/ John W. Baker, Jr., Esq.